REMARKS/ARGUMENTS

35 USC 103

The instant invention relates to an interface for connecting a wireless local area network with a public mobile land network, utilizing an interworking function comprising a dual protocol stack which interfaces the wireless local area network protocols and public mobile land network protocols. Means are provided to detect user movement between a coverage area of the wireless local area network and a coverage area of the public mobile land network by comparing a first routing area identifier associated with the public mobile land network and a second routing area identifier associated with the wireless local area network. The instant invention also relates to a method for interfacing a wireless local area network with a public mobile land network.

Cited U.S. Patent Publication 2006/0291455 to Katz et al relates to an interface between a PLMN network, such as a cellular network, and a non-PLMN network, such as a WLAN. Non-cellular devices attempting to access PLMN networks through non-PLMN networks appear as cellular devices to the PLMN network. As the Examiner has noted, nowhere does Katz et al show or suggest:

"means for detecting user movement between a coverage area of said wireless local area network and a coverage area of said public mobile land network by comparing a first routing area identifier (RAI) associated with said public mobile land network and a second routing area identifier (RAI) associated with said wireless local area network",

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as specifically recited in Claim 1. Nowhere does Katz et al show or suggest

any comparison of routing area identifiers. Furthermore, as the Examiner

has noted, nowhere does Katz et al. show or suggest:

"detecting user movement between a coverage area of said wireless

local area network and a coverage area of said public mobile land network

by comparing a first routing area identifier (RAI) associated with said

public mobile land network and a second routing area identifier (RAI)

associated with said wireless local area network",

as specifically recited in Claim 14. Rather, Katz et al use a handoff

manager to determine when connection quality is low, and instructs the

user to search for another network which will give better connection

quality. See paragraph 0076.

The Examiner has rejected Claim 1 as unpatentable over Katz et al

in view of US Patent 6,661,782 to Mustajarvi et al. Mustajarvi et al relates

to a cellular packet radio network, in which a mobile station sends a

routing area update request to the network when the mobile station roams

to a new cell. Nowhere is there any detection of user movement by

comparing routing area identifiers. Rather, Mustajarvi et al only detects a

new routing area when a new cell is selected. It is therefore clear that even

if the subject matter of Mustajarvi et al were to be combined with the

subject matter of Katz et al, the patentability of Claim 1 would not be

affected.

Claims 2-13 are dependent from Claim 1 and set forth further

advantageous features. The Applicants submit that these subclaims are

patentable as their parent Claim 1.

Similarly, nowhere does Katz et al show or suggest:

"interfacing the wireless local area network to the universal mobile telecommunication system network by providing interfaces towards the universal mobile telecommunications system and the wireless local area network using an interworking function such that communications received from the wireless local area network appear to be from a different serving general packet radio service support node and communications sent to the wireless local area network appear to be from within the wireless local area network; and

detecting user movement between a coverage area of said wireless local area network and a coverage area of said public mobile land network by comparing a first routing area identifier associated with said public mobile land network and a second routing area identifier associated with said wireless local area network",

as specifically set forth in Claim 14. The Examiner has cited Mustajarvi et al to show these features. The Applicants can not agree. Nowhere does Mustajarvi et al show or suggest detection of user movement by comparing route area identifiers. Rather, Mustajarvi et al only detects a new routing area when the user selects a new cell. It is therefore clear that, even if the subject matter of Mustajarvi et al were to be combined with the subject matter of Katz et al, the instant invention as defined by Claim 14 would not be obtained.

Claims 15-18 are dependent from Claim 14 and set forth further advantageous features. The Applicants submit that these subclaims are patentable as their parent Claim 14.

The Examiner has additionally cited US Patent 6,950,662 to Kumar. Kumar relates to a personal information management application which

automatically updates the time of day as a user traverses differing time zones. If Kumar were to be combined with Katz et al, Katz et al would automatically display the correct time of day as a user passes from one time zone to another.

The Examiner has additionally cited US 6,819,937 to Knuutila et al., in which when a mobile station moves from a cell to a new cell, the mobile station compares the old route area identifier with a new route area identifier. The network then determines the validity of the mobile station in the new routing area. Knuutila et al has no need for detecting a routing area identifier in a wireless local area network, since the network of Knuutila et al does not determine the validity of a mobile station in a wireless local area network.

The Examiner has additionally cited US 6,792,270 to Neumann. Neumann relates to a GPRS cell system in which the routing changes as a mobile station moves between cells. Route area identifiers are stored in a table. When the mobile station moves to a new cell, a route area identifier from the table is selected. Nowhere does Neumann detect a route area identifier.

The Examiner has additionally cited US 6,275,706 to Rune. Rune discloses a cellphone network having an identification system to identify a location area and a routing area accommodated by each cell. The network is informed when a mobile station changes location area or routing area so that the network can forward incoming traffic to the mobile station. Nowhere does Rune compare a routing area identifier associated with a public mobile land network with a routing area identifier associated with a wireless local area network. Rather, Rune merely keeps track of where the mobile station is located, so as to properly direct incoming traffic.

The Applicants submit that the instant application is now in condition for allowance. A notice to that effect is respectfully solicited.

Please charge any other costs that may be associated with the filing of this Response to Deposit Account No. 07-0832.

Respectfully submitted,

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